

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASEY OJEDA, individually and on behalf of other persons similarly situated who were employed by VIACOM INC., MTV NETWORKS MUSIC PRODUCTION INC., MTV NETWORKS ENTERPRISES INC.,

Case No. 13 Civ. 5658 (JMF)

Plaintiffs,

against

VIACOM INC., MTV NETWORKS MUSIC PRODUCTION INC., MTV NETWORKS ENTERPRISES INC.,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Lloyd R. Ambinder, the exhibits annexed thereto, and the Memorandum of Law in Support, the undersigned will move this Court before United States District Judge Jesse M. Furman, at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York, 10007, on a return date set by the Court, to permit Court authorized notification to members of the putative collective pursuant to the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 216(b), together with such other and further relief as the Court may deem just and proper.

Dated: New York, New York
January 17, 2014

VIRGINIA & AMBINDER, LLP

/s/ Lloyd R. Ambinder, Esq.

LaDonna M. Lusher, Esq.

Suzanne B. Leeds, Esq.

111 Broadway, Suite 1403

New York, New York 10006

Tel: (212) 943-9080

Fax: (212) 943-9082

lambinder@vandallp.com

LEEDS BROWN LAW, P.C.
Jeffrey K. Brown, Esq.
Michael A. Tompkins, Esq.
Daniel H. Markowitz, Esq.
One Old Country Road, Suite 347
Carle Place, New York 11514
Tel: (516) 873-9550
jbrown@leedsbrownlaw.com

Attorneys for Plaintiff and the Putative Class

To: VEDDER PRICE P.C.
Laura Sack, Esq.
Lyle Zuckerman, Esq.
1633 Broadway, 47th Floor
New York, New York 10019
Tel: (212) 407-6960
Fax: (212) 407-7799

Attorneys for Defendants